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19
 20 **UNITED STATES DISTRICT COURT**
 21 **NORTHERN DISTRICT OF CALIFORNIA**
 22 **SAN FRANCISCO DIVISION**

23 CHRISTINA RIGANIAN and DONNA
 24 SPURGEON, *on behalf of themselves and*
all others similarly situated,

25 v.
 26 LIVERAMP HOLDINGS INC. and
 LIVERAMP INC.,

27 Defendants.

28 Case No. 4:25-cv-824 (JST)

**JOINT CASE MANAGEMENT
 STATEMENT**

Date: December 5, 2025
 Time: 2:00 p.m.
 Location: Zoom

1 Pursuant to the Court’s October 2, 2025 Order (Dkt. No. 79), Plaintiffs Christina Riganian
 2 and Donna Spurgeon (“Plaintiffs”), and Defendants LiveRamp Holdings, Inc. and LiveRamp Inc.
 3 (“LiveRamp”) submit this Updated Joint Case Management Statement in advance of the December
 4 5, 2025 Case Management Conference.

5 **I. Status of Party Discovery**

6 **A. Discovery Propounded by Plaintiffs**

7 **1. Requests for Production**

8 **Plaintiffs’ Position**

9 Plaintiffs served their first set of requests for production (“RFPs”) on LiveRamp on April
 10 11, 2025, a second set on August 14, 2025, and a third set on October 2, 2025 (for a total of 49
 11 RFPs). The parties have met and conferred, and will continue to meet and confer, regarding
 12 LiveRamp’s responses and objections to these RFPs (and related preservation issues).

13 As reflected at Docket No. 83, the parties have entered into a stipulation regarding
 14 LiveRamp’s search for and production of data on the Data Marketplace associated with the named
 15 Plaintiffs in response to RFP No. 3, in partial resolution of the issue raised in the parties’ September
 16 17, 2025 joint discovery letter brief (Dkt. No 72). LiveRamp represents it has begun the process
 17 described in that stipulation, but stated on November 10, 2025 that it “cannot provide or agree to a
 18 specific deadline to build the system, much less produce documents.”

19 While there is currently no dispute ripe for Court intervention, Plaintiffs note that to date
 20 LiveRamp has produced a total of only 969 documents, and LiveRamp’s production in response to
 21 many of Plaintiffs’ RFPs is outstanding. Plaintiffs review of this limited production has revealed
 22 various deficiencies, including insufficient metadata (e.g., document dates), a marked absence of
 23 *any* custodial productions, and apparent failure to produce many foundational documents (e.g., data
 24 architecture documents with respect to the LiveRamp products at issue).¹ LiveRamp’s suggestion
 25 that Plaintiffs have done anything other than eagerly and proactively engage on discovery issues is

26 ¹ While LiveRamp belittles Plaintiffs’ allegations as a ‘caricature,’ those allegations are largely
 27 drawn from and extensively recite LiveRamp’s own descriptions of its business practices.
 28 Plaintiffs’ allegations are accurate and well-founded; despite its bluster to the contrary, LiveRamp
 has yet to make any serious effort to disprove any of Plaintiffs’ allegations, let alone succeed in
 that endeavor.

1 incorrect. In fact, Plaintiffs have twice requested LiveRamp participate in weekly meet and confers,
2 which LiveRamp has thus far declined to do. Plaintiffs have repeatedly engaged with LiveRamp
3 regarding custodians, requesting, since at least August, a fulsome list of custodians, which
4 LiveRamp has refused to provide. To date, LiveRamp has proposed custodians for only *four* RFPs.
5 Plaintiffs have agreed to the proposed custodians for these four requests, subject to identifying other
6 custodians as Plaintiffs begin to receive custodial documents. Plaintiffs thus again requested in a
7 November 20th letter that LiveRamp produce a comprehensive list of proposed custodians for all
8 RFPs, or alternatively, all proposed custodians per topic, product, or request, if LiveRamp insists
9 on identifying custodians in this manner.

10 In addition, in a recent letter, LiveRamp disclosed an initiative to deprecate its use of
11 Driver's License Information and Social Security Numbers such that once the process is completed
12 said information will be available only in "tokenized form." Plaintiffs have requested a meet and
13 confer on this issue, as well as the production deficiencies, and will endeavor to resolve them
14 expeditiously. Should matters reach impasse, Plaintiffs will brief the issues in accordance with
15 Magistrate Judge Tse's discovery procedures.

16 **LiveRamp's Position**

17 LiveRamp disagrees with Plaintiffs' characterization of its discovery efforts to date but
18 agrees that there are no issues ripe for Court intervention. LiveRamp has worked expeditiously to
19 respond to Plaintiffs' incredibly broad discovery requests—going back over six years and
20 spanning multiple different lines of business. The over 5,000 pages of documents that LiveRamp
21 has produced were the product of very substantial effort. They provide Plaintiffs substantial
22 information about how the systems actually work (as opposed to how the systems are caricatured
23 in the complaints). And Plaintiffs are wrong about the purported "deficiencies" with these
24 documents (which, in any event, affect a trivial proportion of the population). As for custodial
25 discovery, LiveRamp has completed very large (and very burdensome) document collections.
26 LiveRamp has promptly proposed custodians for each RFP once the parties reached the
27 appropriate stage of negotiations. Plaintiffs claim that they have "agreed" to custodians, but in
28 fact they did not do so until November 20 (between six weeks and two months after Defendants

1 proposed them), and have done so while purporting to reserve the unilateral right to expand the
 2 list of custodians later. Plaintiffs' lawsuit targets almost every corner of LiveRamp's business,
 3 including separate products that are facilitated by different LiveRamp employees. Plaintiffs'
 4 request for a comprehensive list of proposed custodians for *all* RFPs would result in employees
 5 being custodians for products or services for which they have no knowledge. LiveRamp will
 6 continue to propose custodians for RFPs as the parties reach agreement on each RFP's scope of
 7 production, but those negotiations are ongoing.

8 Once the parties agree on the appropriate scope, custodians, and search terms for
 9 Plaintiffs' requests, LiveRamp will work expeditiously to review and produce custodial
 10 documents. The timeline for producing custodial documents will further depend on the volume of
 11 documents based on the parties' mutually agreed custodians and search terms.

12 LiveRamp similarly disagrees with Plaintiffs' characterization of the issues related to the
 13 depreciation of driver's license and social security numbers. Those efforts are part of entirely
 14 reasonable and *legally required* data minimization efforts pursued in the ordinary course of
 15 business that will not result in the loss of any data in which Plaintiffs have expressed any interest.

16 **Interrogatories**

17 Plaintiffs anticipate serving interrogatories within the next few weeks.

18 **2. Depositions**

19 **Plaintiffs' Position.**

20 Plaintiffs have not yet noticed depositions but anticipate doing so within the month.
 21 Plaintiffs' ability to identify appropriate deponents has been hampered by the fact that, as noted
 22 above, LiveRamp has yet to produce any custodial documents. After repeated requests, LiveRamp
 23 finally identified a limited set of custodians in September and October but has yet to produce any
 24 documents from those custodial files.

25 **LiveRamp's Position.**

26 LiveRamp disagrees with Plaintiffs' characterization that their ability to identify
 27 appropriate deponents has been "hampered" by LiveRamp. For the reasons discussed above,
 28

1 LiveRamp cannot produce custodial documents until the parties have agreed to the appropriate
2 scope, custodians, and search terms for Plaintiffs' requests.

3 **B. Discovery Propounded by LiveRamp**

4 **1. Requests for Production.**

5 **LiveRamp's Position.**

6 LiveRamp served its first set of RFPs on Plaintiffs on August 28, 2025 (containing 5
7 RFPs) and its second set on November 17, 2025 (containing 28 RFPs). In the nearly three months
8 since LiveRamp served its initial RFPs on Plaintiffs, Plaintiffs have not produced a single
9 document. The parties continue to meet and confer on LiveRamp's RFPs, and LiveRamp will
10 continue to do so in good faith.

11 **Plaintiffs' Position.**

12 Plaintiffs timely responded to LiveRamp's initial set of RFPs on September 26, 2025,
13 objecting in large part because LiveRamp's requests sought sweeping discovery that exceeds what
14 is proportional and necessary to this case. Nonetheless, the parties have met and conferred on the
15 scope of these discovery requests and these discussions remain ongoing.

16 **2. Interrogatories.**

17 LiveRamp anticipates serving interrogatories within the next few weeks.

18 **3. Depositions.**

19 **LiveRamp's Position.**

20 LiveRamp anticipates noticing depositions in the coming months. However, LiveRamp
21 has not received any discovery from Plaintiffs, and the timing of its deposition notices will
22 depend on Plaintiffs' productions and responses and objections to LiveRamp's discovery
23 requests.

24 **Plaintiffs' Position.**

25 Plaintiffs remain ready and available to meet and confer on any depositions that LiveRamp
26 seeks to notice and, as summarized above, remain amendable to further discussing the scope of
27 LiveRamp's RFPs—should those meet and confers be requested.

28

1 **II. Other Issues Requiring the Court's Attention**

2 At this time, the parties do not have any issues that require the Court's intervention. At the
3 appropriate time, LiveRamp may seek leave to file motions for summary judgment on discrete
4 claims prior to class certification.

5 **Plaintiffs' Position.**

6 As noted in the prior Case Management Conference Statement, Plaintiffs continue to be
7 concerned with the extremely slow pace of LiveRamp's document production, its failure until very
8 recently to even identify potential document custodians, and the many deficiencies in its extant
9 production of less than 1000 documents. These issues have impeded Plaintiffs' ability to
10 meaningfully prepare for depositions in advance of the class certification deadline. Plaintiffs will
11 nevertheless continue to work diligently to resolve issues quickly and cooperatively to the extent
12 possible, and will seek Court intervention if necessary.

13 **LiveRamp's Position.**

14 LiveRamp has worked expeditiously to meet and confer on, and respond to, Plaintiffs' broad
15 discovery requests. LiveRamp has promptly proposed custodians at the appropriate stage of
16 negotiations for each RFP. LiveRamp has also collected and processed Google Vault and Slack
17 data for the custodians it proposed, which includes tens of millions of documents. The sheer
18 volume of this data has caused significant delays. Plaintiffs' refusal to engage in discussions on
19 responsiveness and custodians, and serial requests for production, have also created barriers to the
20 parties identifying workable search terms. LiveRamp cannot produce, or even identify the
21 appropriate universe of, custodial documents until the parties reach agreement on the appropriate
22 scope, custodians, and search terms for Plaintiffs' requests. LiveRamp will of course continue to
23 work expeditiously and in good faith with Plaintiffs.

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1 Dated: November 25, 2025

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ATTESTATION

I, Jay Barnes, am the ECF User whose ID and password are being used to file this **JOINT CASE MANAGEMENT STATEMENT**. Pursuant to Civil Local Rule 5.1 regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: November 25, 2025

/s/ Jay Barnes

Jay Barnes

SIMMONS HANLY CONROY LLP

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